



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: May 9, 2019

Effective Date: May 9, 2019

Expiration Date: November 8, 2020

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to construct, install, modify or reactivate the air emission source(s) more fully described in the site inventory list. This Facility is subject to all terms and conditions specified in this plan approval. Nothing in this plan approval relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each plan approval condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated as "State-Only" requirements.

Plan Approval No. 23-0003AE

Federal Tax Id - Plant Code: 45-5201144-1

Owner Information

Name: MONROE ENERGY LLC  
Mailing Address: 4101 POST RD  
TRAINER, PA 19061-5052

Plant Information

Plant: MONROE ENERGY LLC/TRAINER  
Location: 23 Delaware County 23949 Trainer Borough  
SIC Code: 2911 Manufacturing - Petroleum Refining

Responsible Official

Name: MICHAEL CAPONE  
Title: REFINERY LEADER  
Phone (610) 364 - 8216

Plan Approval Contact Person

Name: MATT TORELL  
Title: ENVIRONMENTAL LEADER  
Phone: (610) 364 - 8399

[Signature]

  
JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER



#### Plan Approval Description

A plan approval to expand the existing railcar loading station at the Trainer Refinery. The project consists of adding four (4) new loading stations and its associated piping to the existing six (6) stations.

**SECTION A. Table of Contents****Section A. Facility/Source Identification**

Table of Contents  
Plan Approval Inventory List

**Section B. General Plan Approval Requirements**

- #001 Definitions
- #002 Future Adoption of Requirements
- #003 Plan Approval Temporary Operation
- #004 Content of Applications
- #005 Public Records and Confidential Information
- #006 Plan Approval terms and conditions.
- #007 Transfer of Plan Approvals
- #008 Inspection and Entry
- #009 Plan Approval Changes for Cause
- #010 Circumvention
- #011 Submissions
- #012 Risk Management
- #013 Compliance Requirement

**Section C. Site Level Plan Approval Requirements**

- C-I: Restrictions
- C-II: Testing Requirements
- C-III: Monitoring Requirements
- C-IV: Recordkeeping Requirements
- C-V: Reporting Requirements
- C-VI: Work Practice Standards
- C-VII: Additional Requirements
- C-VIII: Compliance Certification
- C-IX: Compliance Schedule

**Section D. Source Level Plan Approval Requirements**

- D-I: Restrictions
- D-II: Testing Requirements
- D-III: Monitoring Requirements
- D-IV: Recordkeeping Requirements
- D-V: Reporting Requirements
- D-VI: Work Practice Standards
- D-VII: Additional Requirements

Note: These same sub-sections are repeated for each source!

**Section E. Alternative Operating Scenario(s)**

- E-I: Restrictions
- E-II: Testing Requirements
- E-III: Monitoring Requirements
- E-IV: Recordkeeping Requirements
- E-V: Reporting Requirements
- E-VI: Work Practice Standards
- E-VII: Additional Requirements

**Section F. Emission Restriction Summary**

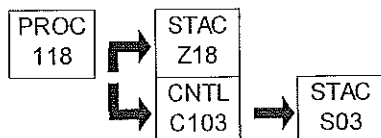


**SECTION A. Table of Contents**

Section G. Miscellaneous

**SECTION A. Plan Approval Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
118	RAILCAR LOADING LPG & BUTANE	1,200.000 BBL/HR	LPG & BUTANE
C103	MAIN FLARE		
S03	MAIN FLARE STACK		
Z18	RAILCAR LOADING FUGITIVES		

**PERMIT MAPS**

**SECTION B. General Plan Approval Requirements****#001 [25 Pa. Code § 121.1]****Definitions**

Words and terms that are not otherwise defined in this plan approval shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1.

**#002 [25 Pa. Code § 127.12b (a) (b)]****Future Adoption of Requirements**

The issuance of this plan approval does not prevent the future adoption by the Department of any rules, regulations or standards, or the issuance of orders necessary to comply with the requirements of the Federal Clean Air Act or the Pennsylvania Air Pollution Control Act, or to achieve or maintain ambient air quality standards. The issuance of this plan approval shall not be construed to limit the Department's enforcement authority.

**#003 [25 Pa. Code § 127.12b]****Plan Approval Temporary Operation**

This plan approval authorizes temporary operation of the source(s) covered by this plan approval provided the following conditions are met.

(a) When construction, installation, modification, or reactivation is being conducted, the permittee shall provide written notice to the Department of the completion of the activity approved by this plan approval and the permittee's intent to commence operation at least five (5) working days prior to the completion of said activity. The notice shall state when the activity will be completed and when the permittee expects to commence operation. When the activity involves multiple sources on different time schedules, notice is required for the commencement of operation of each source.

(b) Pursuant to 25 Pa. Code § 127.12b (d), temporary operation of the source(s) is authorized to facilitate the shakedown of sources and air cleaning devices, to permit operations pending the issuance of a permit under 25 Pa. Code Chapter 127, Subchapter F (relating to operating permits) or Subchapter G (relating to Title V operating permits) or to permit the evaluation of the air contaminant aspects of the source.

(c) This plan approval authorizes a temporary operation period not to exceed 180 days from the date of commencement of operation, provided the Department receives notice from the permittee pursuant to paragraph (a), above.

(d) The permittee may request an extension of the 180-day shakedown period if further evaluation of the air contamination aspects of the source(s) is necessary. The request for an extension shall be submitted, in writing, to the Department at least 15 days prior to the end of the initial 180-day shakedown period and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance, and the reasons compliance has not been established. This temporary operation period will be valid for a limited time and may be extended for additional limited periods, each not to exceed 180 days.

(e) The notice submitted by the permittee pursuant to subpart (a) above, prior to the expiration of the plan approval, shall modify the plan approval expiration date on Page 1 of this plan approval. The new plan approval expiration date shall be 180 days from the date of commencement of operation.

**#004 [25 Pa. Code § 127.12(a) (10)]****Content of Applications**

The permittee shall maintain and operate the sources and associated air cleaning devices in accordance with good engineering practice as described in the plan approval application submitted to the Department.

**#005 [25 Pa. Code §§ 127.12(c) and (d) & 35 P.S. § 4013.2]****Public Records and Confidential Information**

(a) The records, reports or information obtained by the Department or referred to at public hearings shall be available to the public, except as provided in paragraph (b) of this condition.

(b) Upon cause shown by the permittee that the records, reports or information, or a particular portion thereof, but not emission data, to which the Department has access under the act, if made public, would divulge production or sales figures or methods, processes or production unique to that person or would otherwise tend to affect adversely the

**SECTION B. General Plan Approval Requirements**

competitive position of that person by revealing trade secrets, including intellectual property rights, the Department will consider the record, report or information, or particular portion thereof confidential in the administration of the act. The Department will implement this section consistent with sections 112(d) and 114(c) of the Clean Air Act (42 U.S.C.A. § § 7412(d) and 7414(c)). Nothing in this section prevents disclosure of the report, record or information to Federal, State or local representatives as necessary for purposes of administration of Federal, State or local air pollution control laws, or when relevant in a proceeding under the act.

**#006 [25 Pa. Code § 127.12b]****Plan Approval terms and conditions.**

[Additional authority for this condition is derived from 25 Pa. Code Section 127.13]

(a) This plan approval will be valid for a limited time, as specified by the expiration date contained on Page 1 of this plan approval. Except as provided in § § 127.11a and 127.215 (relating to reactivation of sources; and reactivation), at the end of the time, if the construction, modification, reactivation or installation has not been completed, a new plan approval application or an extension of the previous approval will be required.

(b) If construction has commenced, but cannot be completed before the expiration of this plan approval, an extension of the plan approval must be obtained to continue construction. To allow adequate time for departmental action, a request for the extension shall be postmarked at least thirty (30) days prior to the expiration date. The request for an extension shall include the following:

- (i) A justification for the extension,
- (ii) A schedule for the completion of the construction

If construction has not commenced before the expiration of this plan approval, then a new plan approval application must be submitted and approval obtained before construction can commence.

(c) If the construction, modification or installation is not commenced within 18 months of the issuance of this plan approval or if there is more than an 18-month lapse in construction, modification or installation, a new plan approval application that meets the requirements of 25 Pa. Code Chapter 127, Subchapter B (related to plan approval requirements), Subchapter D (related to prevention of significant deterioration of air quality), and Subchapter E (related to new source review) shall be submitted. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.

**#007 [25 Pa. Code § 127.32]****Transfer of Plan Approvals**

(a) This plan approval may not be transferred from one person to another except when a change of ownership is demonstrated to the satisfaction of the Department and the Department approves the transfer of the plan approval in writing.

(b) Section 127.12a (relating to compliance review) applies to a request for transfer of a plan approval. A compliance review form shall accompany the request.

(c) This plan approval is valid only for the specific source and the specific location of the source as described in the application.

**#008 [25 Pa. Code § 127.12(4) & 35 P.S. § 4008 & § 114 of the CAA]****Inspection and Entry**

(a) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.

(b) The permittee shall also allow the Department to have access at reasonable times to said sources and associated air cleaning devices with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act and regulations adopted under the act.

**SECTION B. General Plan Approval Requirements**

(c) Nothing in this plan approval condition shall limit the ability of the Environmental Protection Agency to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

**#009 [25 Pa. Code 127.13a]****Plan Approval Changes for Cause**

This plan approval may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

- (a) The permittee constructs or operates the source subject to the plan approval in violation of the act, the Clean Air Act, the regulations promulgated under the act or the Clean Air Act, a plan approval or permit or in a manner that causes air pollution.
- (b) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (c) The permittee fails to submit a report required by this plan approval.
- (d) The Environmental Protection Agency determines that this plan approval is not in compliance with the Clean Air Act or the regulations thereunder.

**#010 [25 Pa. Code §§ 121.9 & 127.216]****Circumvention**

- (a) The permittee, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.
- (b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this plan approval, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

**#011 [25 Pa. Code § 127.12c]****Submissions**

Reports, test data, monitoring data, notifications shall be submitted to the:

Regional Air Program Manager  
PA Department of Environmental Protection  
(At the address given on the plan approval transmittal letter or otherwise notified)

**#012 [25 Pa. Code § 127.12(9) & 40 CFR Part 68]****Risk Management**

- (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).
- (b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the facility. The permittee shall submit the RMP to the Environmental Protection Agency according to the following schedule and requirements:
  - (1) The permittee shall submit the first RMP to a central point specified by the Environmental Protection Agency no later than the latest of the following:



**SECTION B. General Plan Approval Requirements**

- (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
- (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

(2) The permittee shall submit any additional relevant information requested by the Department or the Environmental Protection Agency concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.

(c) As used in this plan approval condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

**#013 [25 Pa. Code § 127.25]****Compliance Requirement**

A person may not cause or permit the operation of a source subject to § 127.11 (relating to plan approval requirements), unless the source and air cleaning devices identified in the application for the plan approval and the plan approval issued to the source, are operated and maintained in accordance with specifications in the application and conditions in the plan approval issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.

**SECTION C. Site Level Plan Approval Requirements****I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**VII. ADDITIONAL REQUIREMENTS.**

**# 001 [25 Pa. Code §127.12b]**  
**Plan approval terms and conditions.**

The permittee shall comply with all existing requirements of its Operating Permit No. 23-00003, originally issued and subsequently amended, unless specifically revised in this Plan Approval. The provisions in this Plan Approval shall be construed to supersede any contrary provisions in any previous Plan Approval(s) and Operating Permit(s).

**VIII. COMPLIANCE CERTIFICATION.**

No additional compliance certifications exist except as provided in other sections of this plan approval including Section B (relating to Plan Approval General Requirements).

**IX. COMPLIANCE SCHEDULE.**

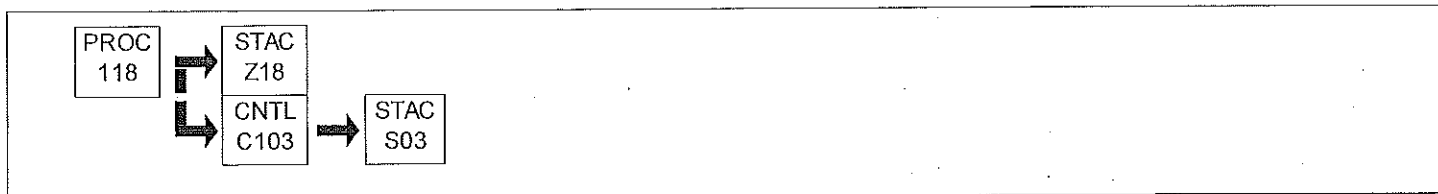
No compliance milestones exist.

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 118

Source Name: RAILCAR LOADING LPG &amp; BUTANE

Source Capacity/Throughput: 1,200,000 BBL/HR LPG &amp; BUTANE

**I. RESTRICTIONS.****Emission Restriction(s).**

# 001 [25 Pa. Code §123.21]

**General**

The following is applicable to the Main Flare (Source C103), that controls the emissions from this source:

No person may permit the emission into the outdoor atmosphere of sulfur oxides from this source in a manner that the concentration of the sulfur oxides, expressed as SO<sub>2</sub>, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

# 002 [25 Pa. Code §127.12b]

**Plan approval terms and conditions.**

VOC emissions from the loading or offloading of propane, n-butane, and isobutane shall not exceed 3.94 tons in any 12 consecutive month period.

**Fuel Restriction(s).**

# 003 [25 Pa. Code §127.12b]

**Plan approval terms and conditions.**

Only propane, n-butane, and isobutane products shall be loaded or offloaded at the railcar loading stations.

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**III. MONITORING REQUIREMENTS.**

# 004 [25 Pa. Code §127.12b]

**Plan approval terms and conditions.**

The permittee shall monitor the number of railcars and the amount and type of product being loaded or off-loaded on a daily and monthly basis.

**IV. RECORDKEEPING REQUIREMENTS.**

# 005 [25 Pa. Code §127.12b]

**Plan approval terms and conditions.**

The permittee shall maintain records of the number of railcars and the amount and type of product being loaded or off-loaded on a daily and monthly basis.

# 006 [25 Pa. Code §127.12b]

**Plan approval terms and conditions.**

The permittee shall maintain records of the following on a monthly basis:

**SECTION D. Source Level Plan Approval Requirements**

- (a) Total VOC emission calculations from the flare.
- (b) Fugitive VOC emission calculations from the railcar loading stations and piping components.

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**VI. WORK PRACTICE REQUIREMENTS.****# 007 [25 Pa. Code §127.12b]  
Plan approval terms and conditions.**

- (a) Emissions from the LPG truck loading rack shall be captured and sent to the refinery's main flare (Source C103), which utilizes a flare gas recovery system.
- (b) The permittee shall continue to comply with all requirements specified in TVOP No. 23-00003 for Source ID 103: Main Flare.

**# 008 [25 Pa. Code §127.12b]  
Plan approval terms and conditions.**

The permittee shall comply with the requirements of the Consent Decree issued by US EPA (Civil Action No. H-05-0258; filed January 27, 2005), and all applicable requirements of NSPS Subpart GGGa for Equipment Leaks of VOC in Petroleum Refineries for which Construction, Reconstruction, or Modification Commenced after November 7, 2006, whichever is more stringent. The requirements for leak detection and repair (LDAR) for the NSPS are specified under the Title V Operating Permit 23-00003, Section D, Source ID 215, NSPS New Fugitive Equipment.

[Compliance with the requirements in this streamlined permit condition assures compliance with the provisions found in 25 Pa. Code § 129.58.]

**# 009 [25 Pa. Code §127.12b]  
Plan approval terms and conditions.**

Pumps handling volatile organic compounds with a vapor pressure of greater than 1.5 psi at actual conditions shall have mechanical seals. For the purpose of determining vapor pressure, a temperature no greater than 100°F shall be used.

**VII. ADDITIONAL REQUIREMENTS.****# 010 [25 Pa. Code §127.12b]  
Plan approval terms and conditions.**

Prior to issuance of the Operating Permit, the permittee shall provide to the Department a list of the equipment that is subject to 40 CFR Part 60 Subpart GGGa, the applicable requirements for the equipment and the methods of complying with the requirements.

**SECTION E. Alternative Operation Requirements.**

No Alternative Operations exist for this Plan Approval facility.

**SECTION F. Emission Restriction Summary.**

Source Id	Source Description		
118	RAILCAR LOADING LPG & BUTANE		
Emission Limit		Pollutant	
500.000	PPMV	dry basis	SO2
3.940	Tons/Yr	12-month rolling basis	VOC

**Site Emission Restriction Summary**

Emission Limit	Pollutant
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**SECTION G. Miscellaneous.**



\*\*\*\*\* End of Report \*\*\*\*\*

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